

TROY LAW, PLLC
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*Attorney for the Plaintiffs, proposed FLSA Collective and
potential Rule 23 Class*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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WING KAM LI,
*on his own behalf and on behalf of others similarly
situated,*

Plaintiff,

Case No. 18-cv-04614

v.

**AFFIRMATION IN SUPPORT
OF REQUEST FOR
CERTIFICATE OF DEFAULT**

KINGLY COACH, INC. d/b/a Kingly Coach; and
BWJ GROUP INC.;
SUNG AE KIM,
ANDY MENG, and
DAE KUN YI

Defendants.

-----X

I, John Troy, an attorney duly admitted to practice in the Eastern District of New York,
declare under penalty of perjury:

1. I am owner and managing partner at Troy Law, PLLC and attorney for Plaintiffs in above-entitled action. I am familiar with all the facts and circumstance in this action.
2. I make this affirmation pursuant to Rule 55.1 of the Civil Rules for the Eastern District of New York, in support of Plaintiffs' request for Clerk's Certificate of Default.
3. This is an action brought under the Fair Labor Standards Act and New York Labor Law arising from Defendants' alleged violations and various willful and

unlawful employment policies, patterns and/or practices.

4. This action was commenced on August 15, 2018 by filing the Complaint.
(Dkt. No. 1)

5. The Summons to the Complaint against Defendants KINGLY COACH, INC. d/b/a Kingly Coach; was issued on August 15, 2018. (Dkt. No. 2)

6. On October 10, 2018, a copy of the Summons to the Complaint and Complaint was served on Corporate Defendants KINGLY COACH, INC. d/b/a Kingly Coach; and BWJ GROUP INC. pursuant to Rule 4(h)(1)(B) of the Federal Rules of Civil Procedure by delivering to and leaving a copy of the documents with Sue Zouky, an authorized agent in the office of the New York Secretary of State authorized to accept service on behalf of Corporate Defendant.

7. Proof of service was file on October 12, 2018. (Dkt. Nos. 09–10). The time for Corporate KINGLY COACH, INC. d/b/a Kingly Coach; and BWJ GROUP INC to answer or otherwise move with respect to the Complaint expired November 10, 2018.

7. Defendants are not incompetent.

8. Defendants are not infants.

9. Defendants were not in the United States Military at the time they were served.

I affirm, under penalty of perjury, that the above and foregoing information is true and correct.

Dated: Flushing, New York
July 15, 2019

Respectfully submitted,
TROY LAW, PLLC

/s/ John Troy

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